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VIA ECF AND HAND DELIVERY

Hon. George B. Daniels
United States District Judge
United States District Court
for the Southern District of New York
500 Pearl Street
New York, New York 10007-1312

Re: *Sokolow, et al. v. Palestinian Liberation Organization, et al.*
Docket No. 04-CV-397 (GBD)(RLE)

Dear Judge Daniels:

I respectfully write in response to defendants' December 5 letter, in which they state that they do not intend to provide the basis for their hundreds of unexplained objections to the translation, organization and "completeness" of plaintiffs' trial exhibits until the Court rules on their "primary" objections. During the November 20 conference, the Court said "at this point" the parties "should prepare for trial, assuming that all of the evidence that you want to put in will be in, and all of the evidence that they want to put in will be in." 11/20/14 Tr. 33:10-13.

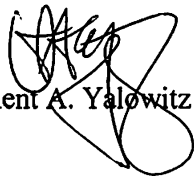
The Court has repeatedly asked the parties to confer over objections to documentary evidence. Defendants' refusal to meet and confer, or even to provide any information about their objections, is the latest example of defendants' vexatious and harassing approach to the defense of this case. A failure to address these issues in advance will delay and prolong the trial. Defendants have had plaintiffs' trial exhibits and translations for **nine** months. Yet, one month before trial, they concede that they have not even analyzed the basis for their own objections, never mind shared information pertaining to those objections with their adversary.

Defendants' decision to ignore the Court's advice should be to their detriment, and not the detriment of plaintiffs, the Court or the jury. Defendants should be given a date certain to provide the basis for their objections in advance of trial.

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Page 2

Respectfully,



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cc: All ECF Counsel